



Winston H. Hickox
Secretary for
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California Regional Water Quality Control Board

San Francisco Bay Region

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Gray Davis
Governor

Date: January 9, 2003

Al Wright
California Department of Fish and Game
Wildlife Conservation Board
1807 Thirteenth St., Suite 103
Sacramento, CA 95814

Subject: **Cargill Salt Pond Data, South San Francisco Bay**

Dear Mr. Wright:

This letter responds to your request for a written determination from Regional Board staff whether cleanup activities are warranted at the Cargill Salt Ponds, based on a review of available data on water quality, sediment quality, and levels of contaminants in tissues of fish and invertebrates.

Staff does not believe that physical removal of pond sediments or water will be required by our laws and regulations. The ponds do not contain pollutants in sediments or water at levels that require cleanup pursuant to regulations governing hazardous waste cleanups. For instance, the highest mercury concentration observed, 1.92 mg/kg in sediment, is well below the 20 mg/kg threshold that would require disposal in a hazardous waste landfill. Because of the mercury mining legacy in the South Bay, however, about 10% of the sediment samples in the Alviso area exceed the Board's guidelines for mercury in wetland cover, which suggests some challenges for wetland restoration efforts in the area. I have attached an updated memorandum, dated January 9, 2003, based on comments received from the resource agencies and their consultants. If you have any questions, please contact me at (510) 622-2439 or smm@rb2.swrcb.ca.gov.

Sincerely,

Steven M. Moore, P.E., Chief
Policy and Planning Division

cc: Margaret Kolar, USFWS
Barbara Ransom, Cargill Salt